

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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**U.S. ASIA GLOBAL, INC.**

**Plaintiff,**

**vs.**

**Case No. 1:20-cv-05783**

**GLOBALGEEKS, INC.**

**Defendants.**

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**JOINT SUBMISSION  
RESPONSIVE TO THE COURT'S TEXT ORDER D.E. 17**

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**COMES NOW**, Plaintiff, U.S. Asia Global, Inc. ("USAG") and Defendant GlobalGeeks, Inc. ("GlobalGeeks"), by and through respective undersigned Counsel of Record, and in response to the Court's Text Order referenced at D.E. 17, submit the following joint stipulation as to the efforts made to resolve this matter and obviate the need for the emergency relief sought by USAG.

USAG's position is that the return by GlobalGeeks of the 476,000 masks being held by GlobalGeeks in its Moorestown, New Jersey warehouse would resolve this case and all matters in controversy between the parties. There is no dispute that USAG purchased, imported, delivered, and owns the 476,000 masks being held by GlobalGeeks in its Moorestown, New Jersey warehouse.

On May 14, 2020, after USAG filed its Verified Complaint local counsel for USAG attempted to contact Counsel of Record for GlobalGeeks and settle the matter obviating the need for the emergency relief.

On May 18, 2020, following Judge Kugler's Order to Show Cause setting the Preliminary Injunction Hearing for May 22, 2020, USAG spoke directly with Counsel of Record for

GlobalGeeks and offered to dismiss the Verified Complaint, forgo the request for emergent injunctive relief, and absorb all costs of initial delivery and retrieval, if GlobalGeeks will release USAG's 476,000 masks. GlobalGeeks neither declined the offer nor submitted a counter-offer and instead filed its 20-page Memorandum in Opposition to the TRO and Preliminary Injunction.

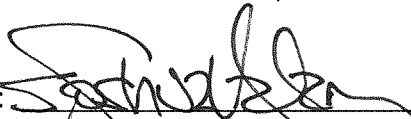
On May 21, 2020, when conferring with Counsel of Record for GlobalGeeks in preparation of the instant Joint Submission (D.E. 17), USAG again offered to dismiss its Verified Complaint, forgo its request for emergent injunctive relief, absorb all costs of initial delivery and retrieval, and also to indemnify GlobalGeeks from any claims made by any third-party to ownership rights over the 476,000 masks, if GlobalGeeks will release to USAG its 476,000 masks. GlobalGeeks refused the offer and indemnification.

In response, GlobalGeeks re-affirms its position as discussed in its opposition to the Order to Show Cause and as supported by the Declaration of Abdul Loul, that GlobalGeeks has only conducted business with SZN in relation to Shipment No. 2 and Shipment No. 3. Accordingly, it is GlobalGeeks' position that it will only release Shipment No. 3 to SZN and not USAG, which is a third party to any deal between SZN and GlobalGeeks. GlobalGeeks is willing to release Shipment No. 3 to SZN if SZN refunds the money GlobalGeeks paid SZN for Shipment No. 2. GlobalGeeks will also return Shipment No. 2 to SZN upon receiving the refund.

DATED: May 22, 2020.

Respectfully submitted,

**GLANKLER BROWN, PLLC**

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